

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA,

V.

JOSEPH SULLIVAN, ET AL.  
Defendants

CRIM. NO. 04-30046-MAP DISTRICT COURT  
DISTRICT OF MASS.

JUNE 12, 2006

**MOTION OF DEFENDANT JOSEPH SULLIVAN  
TO MODIFY CONDITIONS OF RELEASE**

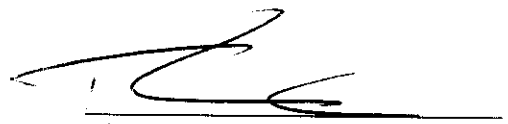
Now comes the Defendant, Joseph Sullivan, and moves that the conditions of his pre-sentencing release, restricting his travel to the Commonwealth of Massachusetts and surrounding New England states be modified.

The Defendant seeks permission to travel to Delaware with his fiancée Amanda Hendrix for a vacation from Friday, June 16, 2006 until Saturday evening June 17, 2006. Mr. Sullivan and his fiancée will be staying with Ms. Hendrix's aunt, Donna Rodrigues at 31 White Rabbit Road, Smyrna, Delaware. Mr. Sullivan will have his cell phone, telephone number 413-335-3930, throughout this vacation.

Counsel for the Defendant has conferred with counsel for the government and the government does not oppose the allowance of this motion.

Wherefore the Defendant respectfully requests that the within motion be allowed.

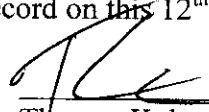
The Defendant  
Joseph Sullivan,  
By His Attorney,



Thomas Kokonowski, Esq.  
101 State Street, Suite 715  
Springfield, MA 01103  
Tel. (413) 737-9700  
Fax (413) 733-1245

**CERTIFICATE OF SERVICE**

I, Thomas Kokonowski, Esquire, counsel of record, do hereby certify that I have served a copy of the foregoing motion by mail, to all attorneys of record on this 12<sup>th</sup> day of June, 2006.

  
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Thomas Kokonowski